

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL TAYLOR,

Defendant.

Case No. 2:13-cr-00238 JAD-VCF

STIPULATION TO MODIFY  
CONDITIONS OF RELEASE

**IT IS HEREBY STIPULATED AND AGREED**, by and between Daniel G. Bogden, United States Attorney, and Cristina Silva, Assistant United States Attorney, Counsel for the United States of America, and Randall J. Roske, Esq., counsel for Mr. Michael Taylor, Defendant, that his travel restrictions to allow him to travel for employment purposes to the State of Nevada and California, with advance notice to his supervising Pre-trial Service officer and or Probation Officer.

This stipulation is entered into for the following reasons:

1. That the Defendant has a Commercial Driver's License, and is employed by All Pro Hydrojetting & Pumping, LLC.
2. That Mr. Taylor's employer has customers in Nevada and California who require the companies services.
3. That the travel out of the District of Arizona, to Nevada and California will be an ongoing need for Mr. Taylor's employer.
4. That the parties stipulate that the proposed modification of conditions of travel on his Personal Recognizance Bond be made in the light of the foregoing, and because the Office of Pre-Trial Services does not oppose said request.

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DATED this 31<sup>st</sup> day of March, 2015

DANIEL BOGDEN  
United States Attorney

/s/  
Randall J. Roske  
Counsel for Defendant  
Michael Taylor

/s/  
Cristina Silva  
Assistant United States Attorney  
Counsel for the United States

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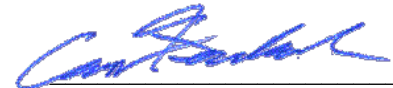
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**ORDER MODIFYING TRAVEL RESTRICTIONS**

Based upon the pending stipulation of counsel, and good cause appearing therefore, the Court makes the following Order:

IT IS HEREBY ORDERED that the conditions of release for the Defendant Michael Taylor are modified to allow him to travel to the District of Nevada, and the State of California, for employment purposes, provided that he advises his supervising officer of said travel in advance. All other conditions of his Order releasing him on his personal recognizance shall remain in full force and effect.

DATED this 1st day of April, 2015.



UNITED STATES MAGISTRATE JUDGE